

Shoshone-Bannock Tribes/ RCRA Program
Anderson Filter Media (AFM) Washing Unit
Closure Plan Comments
August 24, 2001
Revised August 30, 2001

7009518
FFI 7a
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General Comment
Maximum Waste Inventory

The Anderson Filter Media (AFM) Washing Unit was operated in a batch process from April 1992 through November 1995. Total capacity of the washing unit and the secondary container was 500 gallons. Provide an estimated number of batches processed through the washing unit and an estimated volume of material that went to V-1400, V-3600 and the Waste Water Treatment Unit #12.

Section 3- Closure Plan Description part 3.5, Sampling and Analysis Plan.

Following decontamination of the AFM Washing Unit, conduct a check of remaining fram and parts for Alpha and Beta radioactivity levels.

Section 4- Closure Procedures, 4.2 Waste Inventory Removal.

Prior to decontamination and dismantling of the unit, the AFM Washing Unit will be inspected to confirm the inventory and all wastewater has been removed. If not empty, any wastewater in the unit will be discharged to the on-site Pond 18 through existing piping and Tanks V-1400 and V- 3600.

The current case-by-case extension for continued use of Pond 18 does not include AFM Washing Unit decontamination water.

Section 4- Closure Procedures, 4.3 Process Equipment, paragraph 2.

Once the course of action is cleared by inspection, the unit will be dismantled and removed from the area for salvage/scrap or disposal.

Alpha and Beta radioactivity measurements should be taken prior to the decision to salvage/scrap or dispose of process equipment.

Appendix A, Task Specific Health and Safety Plan Section 3 part 3.1, Chemical Hazards and Table A-1 Potential Effects of Chemicals that may be present.

Hydrogen Cyanide was omitted from the list of potential chemical hazards which may be present.

Appendix A, Task Specific Health and Safety Plan, Section 9. Decontamination Procedures,

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page A-13 last sentence.

"Disposable PPE gear will be accumulated in containers and transported to an on-site landfill."

This statement should include: soiled disposable PPE gear will be accumulated in containers and tested for all eight RCRA Metals by the Toxicity Characteristics Leaching Procedure (TCLP), prior to determination of appropriate disposal options.

Appendix B, Field Sampling Plan

1. Provide a section in the Field Sampling Plan describing procedures to test soiled disposable PPE for RCRA parameters.
2. Provide a section in the Field Sampling Plan describing procedures to test process equipment from the (AFM) Washing Unit, after decontamination, for Alpha and Beta Radioactivity levels.

Additional Request

Provide the Shoshone-Bannock Tribes CERCLA/RCRA program with the following information:

1. Notification prior to commencement of field work, seven working days;
2. All analytical results from closure activities including: analysis from initial rinsing of equipment and gross alpha and beta measurements taken on process equipment following decontamination;
3. Disposal option selection for waste;
4. Copy of any Waste Manifest or Waste Profile, new or amended, that result from this closure.